

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
PROJECT VERITAS ACTION FUND,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 1:16-cv-10462-PBS
	)	
RACHAEL ROLLINS, in her official	)	
capacity as Suffolk County District	)	
Attorney,	)	
	)	
Defendant.	)	
_____	)	

**PLAINTIFF’S ASSENTED-TO MOTION FOR EXTENSION OF TIME TO FILE  
MOTION FOR ATTORNEYS’ FEES**

Plaintiff Project Veritas Action Fund (“PVA”) moves this Court for an extension of time to file a motion for attorneys’ fees until August 5, 2019. The undersigned counsel has consulted with counsel for the Defendant and opposing counsel has assented to that extension.

In support of this motion, PVA states as follows. Good cause exists to grant this extension. Defendant is still determining if she will file a notice of appeal in this matter. If the Commonwealth files an appeal, the fees request will need to have a stay entered until the resolution of the appeal. If it does not file an appeal, the parties will need to resolve the fees request. Because of this uncertainty, granting an extension of time to file for attorneys’ fees will allow for the orderly advancement of this case.

In conclusion, PVA requests an extension until August 5, 2019 to file its fees request in this matter.

Dated: June 5, 2019

Respectfully submitted,

PROJECT VERITAS ACTION FUND,

By its attorneys,

/s/ Benjamin Barr

Benjamin Barr (Pro Hac Vice)  
Statecraft PLLC  
444 N. Michigan Ave. #1200  
Chicago, Illinois 60611  
202-595-4671 – o  
ben@statecraftlaw.com  
*admitted pro hac vice*

Stephen R. Klein (Pro Hac Vice)  
Statecraft PLLC  
1629 K Street NW  
Suite 300  
Washington, DC 20006  
(202) 804-6676 -o  
steve@statecraftlaw.com  
*admitted pro hac vice*

Daniel J. Kelly, BBO# 553926  
dkelly@mccarter.com  
McCarter & English, LLP  
265 Franklin Street Boston, MA 02110  
617-449-6500 – o  
617-326-3098 – f

June 5, 2019

**CERTIFICATE OF SERVICE**

I, Benjamin T. Barr, hereby certify that on this 5th day of June, 2019 the foregoing Notice of Manual Filing was electronically filed with the Clerk of the Court using the CM/ECF system and will be sent electronically to the registered participants as identified on the Notice of

Electronic Filing (NEF).

/s/ Benjamin Barr